

1 Kirsten A. Milton
Nevada State Bar No. 14401
2 Kyle J. Hoyt
Nevada State Bar No. 14886
3 **JACKSON LEWIS P.C.**
300 S. Fourth Street, Suite 900
4 Las Vegas, Nevada 89101
Tel: (702) 921-2460
5 Fax: (702) 921-2461
kirsten.milton@jacksonlewis.com
6 kyle.hoyt@jacksonlewis.com
7 Attorneys for Defendant
Wyndham Vacation Ownership, Inc.
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 RENEE DEAN,
12 Plaintiff,
13 vs.

14 WYNDHAM VACATION OWNERSHIP,
INC., a Nevada corporation; DEMETRIUS
15 BARNES, an individual; DOES I through
X, inclusive; and ROE BUSINESS
16 ENTITIES, I through X, inclusive,
17 Defendants.
18

Case No. 2:22-cv-00141-GMN-NJK

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

19 IT IS HEREBY STIPULATED by and between Plaintiff RENEE DEAN ("Plaintiff"),
20 through her counsel Hone Law, and Defendant Wyndham Vacation Ownership, Inc. ("Wyndham"),
21 through its counsel Jackson Lewis P.C., that Wyndham and Demetrius Barnes shall have an
22 extension up to and including Monday, March 7, 2022, in which to file a response to Plaintiff's
23 Complaint. This Stipulation is submitted and based upon the following:

- 24 1. Wyndham's response to the Complaint is currently due on February 22, 2022.
- 25 2. Barnes' response to the Complaint is currently due on February 22, 2022.
- 26 3. Due to counsel's recent retention, additional time is required to investigate
27 Plaintiff's allegations before providing a responding to the Complaint.
- 28 4. This is the first request for an extension of time for Defendant to file a response

Plaintiff's Complaint.

5. This request is made in good faith and not for the purpose of delay.

Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 11th day of February, 2022.

HONE LAW

JACKSON LEWIS P.C.

/s/ Amy L. Howard

Amy L. Howard, NV State Bar No. 13946
701 N. Green Valley Pkwy., Suite 200
Henderson, NV 89074

/s/ Kirsten A. Milton

Kirsten A. Milton, NV State Bar No. 14401
Kyle J. Hoyt, NV State Bar No. 14886
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101

Attorneys for Plaintiff
Renee Dean

Attorneys for Defendant
Wyndham Vacation Ownership, Inc.

ORDER

IT IS SO ORDERED:



Nancy J. Koppe
United States Magistrate Judge

Dated: February 14, 2022